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Counsel for Defendant GILARD

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	
	)	No. CR 12-00616-YGR
Plaintiff,	)	
	)	STIPULATION TO CONTINUE; ORDER
vs.	)	CONTINUING CASE AND EXCLUDING
	)	TIME UNDER THE SPEEDY TRIAL ACT
TONYA GILARD, ET AL .,	)	
	)	
Defendant.	)	
_____	)	

IT IS HEREBY STIPULATED, by and between the parties to this action, that the STATUS HEARING date of November 8, 2012 presently scheduled at 2:00 p.m., before the Honorable Yvonne Gonzales Rogers, be vacated and re-set for **December 20, 2012** at 2:00 p.m. for TRIAL OR MOTIONS SETTING OR DISPOSITION HEARING.

The reason for this request is that all defense counsel are continuing to review, organize, and investigate voluminous discovery in this case. Presently there are approximately 2600 pages of discovery including financial records and tax documents. Search warrant affidavits are forthcoming.

The parties agree and stipulate that the time until **December 20, 2012** should be excluded, under 18 U.S.C. §3161(H)(7)(A) and (B)(iv), because the ends of justice served by the

1 granting of the continuance outweigh the best interests of the public and the defendant in a  
2 speedy and public trial. The continuance is necessary to accommodate counsel's preparation  
3 efforts.

4  
5 Date 11/06/12 /s/  
6 John Paul Reichmuth  
7 Assistant Federal Public Defender  
8 Counsel for defendant GILARD

9 Date 11/06/12 /s/  
10 Rees Morgan  
11 Counsel for defendant HARVEY

12 Date 11/06/12 /s/  
13 Doron Weinberg  
14 Counsel for defendant CRUMMIE

15 Date 11/06/12 /s/  
16 Thomas Newman  
17 Assistant United States Attorney

ORDER

The court finds that the ends of justice served by the granting of the continuance outweigh the best interests of the public and the defendant in a speedy and public trial. The continuance is necessary to accommodate counsel's preparation efforts including the review, organization, and investigation of over 2600 pages of discovery. Based on these findings, IT IS HEREBY ORDERED THAT the above-captioned matter be continued to **December 20, 2012** at 2:00 p.m., and that time be excluded from the date of this order to **December 20, 2012** pursuant to 18 U.S.C. §§3161(h)(7)(A) and (B)(iv).

IT IS SO ORDERED.

November 7, 2012  
Date

  
\_\_\_\_\_  
HON. YVONNE GONZALEZ ROGERS  
UNITED STATES DISTRICT JUDGE